

The Honorable Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UGOCHUKWU GOODLUCK NWAUZOR,
FERNANDO AGUIRRE-URBINA, individually
and on behalf of all those similarly situated,

Plaintiffs/Counter Defendants,

v.

THE GEO GROUP, INC.,

Defendant/Counter Claimant

Case No. 3:17-cv-05769-RJB

**DEFENDANT/COUNTER CLAIMANT'S
UNOPPOSED MOTION TO WAIVE
GEOGRAPHIC REQUIREMENT IN
LCR 83.1**

**NOTE ON MOTION CALENDAR:
MARCH 18, 2019**

Defendant/Counter Claimant The GEO Group, Inc. ("GEO") respectfully asks this Court to waive the geographic requirement for local counsel in LCR 83.1(d)(2). Counsel for GEO has conferred with plaintiffs' counsel regarding the subject of this motion, and plaintiffs do not oppose this motion.

Counsel for GEO, J. Matthew Donohue, Shannon Armstrong, and Kristin Asai, are lawyers with Holland & Knight's Portland office ("Portland Counsel"). Portland Counsel are members of the Washington Bar and admitted to practice in this District. Portland Counsel would like to serve as local counsel in this matter under LCR 83.1(d) and submit a *pro hac vice* application on behalf of their colleague, Carolyn Short, a lawyer with Holland & Knight's Philadelphia office.

Under LCR 83.1(d)(2), local counsel must have a physical office within the District. Holland & Knight does not have an office within the District. Portland Counsel therefore request that the

1 Court waive the geographic requirement because: (1) Portland Counsel are admitted to practice in
2 this District; (2) Portland Counsel regularly practice in this District and have four other pending
3 matters in this Court; (3) Portland Counsel are physically located near the District in Portland,
4 Oregon; and (4) this Court previously waived this requirement for two other matters currently
5 pending in this District: (1) *Ryanair DAC v. Expedia, Inc.*, Case No. 2:17-CV-01789-RSL; and (2)
6 *Frantz Samson v. UnitedHealthcare Services, Inc.*, 2:19-cv-00175-JLR.

7 Dated: March 18, 2019

8 HOLLAND & KNIGHT LLP

9
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Attorneys for Defendant/Counter Claimant

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing DEFENDANT/COUNTER CLAIMANT'S UNOPPOSED MOTION TO WAIVE GEOGRAPHIC REQUIREMENT IN LCR 83.1 to be served on the following person[s]:

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by causing the document to be delivered by the following indicated method or methods:

- ☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.
- ☐ by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- ☐ by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- ☐ by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.
- ☐ by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED March 18, 2019.

s/ Kristin M. Asai
Kristin M. Asai